

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.: 10/797,765 Confirmation No.: 3955
Appellant(s): Poyhonen, Petteri
Filed: March 10, 2004
Art Unit: 2617
Examiner: Gonzalez, Amanico
Title: SYSTEM AND METHOD FOR ESTABLISHING A SESSION INITIATION
PROTOCOL COMMUNICATION SESSION WITH A MOBILE TERMINAL

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APPEAL BRIEF UNDER 37 CFR § 41.37

This Appeal Brief is filed pursuant to the "Notice of Appeal to the Board of Patent Appeals and Interferences," filed March 17, 2011, and the "Notice of Panel Decision from Pre-Appeal Brief Review," mailed May 17, 2011.

1. ***Real Party in Interest.***

The real party in interest in this appeal is Nokia Corporation, the assignee of the above-referenced patent application.

2. ***Related Appeals and Interferences.***

There are no related appeals and/or interferences involving this application or its subject matter.

3. ***Status of Claims.***

All of the pending claims under consideration, namely Claims 1-54, stand rejected and are the subject of the present appeal.

4. ***Status of Amendments.***

There are no unentered amendments in this application.

5. ***Summary of Claimed Subject Matter.***

The claimed invention will now be summarized with references to passages of the specification and drawings. It should be understood, however, that the references are provided solely for explanatory purposes, and should not otherwise in and of themselves be taken to limit the scope of the claimed invention.

Independent Claim 1 recites a processor and a memory including computer program code, with the memory and computer program code being configured to, with the processor, cause the apparatus to at least perform a number of operations. *See, e.g.*, Pat. Appl., FIG. 2, and p. 10, ll. 15-23. The apparatus of independent Claim 1 is caused to receive a connection request via a network across which an originating client is configured to communicate. *Id.* at FIG. 5, and p. 20, ll. 2-20. The apparatus is caused to prepare a network-independent trigger for transmission to a terminal in response to receipt of the connection request. *Id.* at FIG. 5, and p. 20, l. 21 – p. 21, l. 16. And the apparatus is caused to receive a registration message, in response to the trigger, from the terminal via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal. *Id.* at FIG. 5, and p. 21, l. 17 – p. 22, l. 5.

Independent Claim 10 recites a processor and a memory including computer program code, with the memory and computer program code being configured to, with the processor, cause the apparatus to at least perform a number of operations. *See, e.g.*, Pat. Appl., FIG. 2, and p. 10, ll. 15-23. The apparatus of independent Claim 10 is caused to receive a registration message via a network across which an originating client is configured to communicate, where the apparatus is caused to receive the registration message from a terminal to thereby register the terminal with the apparatus, and the registration message includes a network-independent identity of the terminal. *Id.* at FIG. 4, and p. 17, l. 17 – p. 18, l. 2. The apparatus is also caused to prepare a network-independent trigger for transmission to the terminal based upon the

network-independent identity of the terminal. *Id.* at FIG. 5, and p. 20, l. 21 – p. 21, l. 16. The terminal is thereby triggered to update registration of the terminal with the apparatus, including acquisition by the apparatus of a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal. *Id.*

Independent Claim 19 recites a method including receiving a connection request at an apparatus via a network across which an originating client is configured to communicate. *Id.* at FIG. 5, and p. 20, ll. 2-20. The method includes preparing a network-independent trigger for transmission from the apparatus to a terminal in response to receiving the connection request. *Id.* at FIG. 5, and p. 20, l. 21 – p. 21, l. 16. And the method includes receiving a registration message, in response to the trigger, at the apparatus from the terminal via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal. *Id.* at FIG. 5, and p. 21, l. 17 – p. 22, l. 5.

Independent Claim 28 recites a method including receiving a registration message at an apparatus via a network across which an originating client is configured to communicate, where the registration message is received from a terminal to thereby register the terminal with the apparatus, and the registration message includes a network-independent identity of the terminal. *Id.* at FIG. 4, and p. 17, l. 17 – p. 18, l. 2. And the method includes preparing a network-independent trigger for transmission to the terminal based upon the network-independent identity of the terminal. *Id.* at FIG. 5, and p. 20, l. 21 – p. 21, l. 16. The terminal is thereby triggered to update registration of the terminal with the apparatus, including acquisition by the apparatus of a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal. *Id.*

Independent Claim 37 recites a processor and a memory including computer program code, with the memory and computer program code being configured to, with the processor, cause the apparatus to at least perform a number of operations. *See, e.g.,* Pat. Appl., FIG. 2, and p. 10, ll. 15-23. The apparatus of independent Claim 37 is caused to receive a trigger from another apparatus operating in a network across which an originating client is configured to

communicate, with the trigger comprising a network-independent trigger. *Id.* at FIG. 5, and p. 20, l. 21 – p. 21, l. 16. And in response to receipt of the trigger, the apparatus is caused to prepare a registration message for transmission to the other apparatus via the network to thereby register the apparatus with the other apparatus and acquire a network-dependent identity of the apparatus to thereby enable establishment of a communication session with the apparatus based upon the network-dependent identity of the apparatus. *Id.* at FIG. 5, and p. 21, l. 17 – p. 22, l. 5.

Independent Claim 46 recites a processor and a memory including computer program code, with the memory and computer program code being configured to, with the processor, cause the apparatus to at least perform a number of operations. *See, e.g.*, Pat. Appl., FIG. 2, and p. 10, ll. 15-23. The apparatus of independent Claim 46 is caused to prepare a registration message for transmission to another apparatus operating in a network across which an originating client is configured to communicate. *Id.* at FIG. 4, and p. 17, l. 17 – p. 18, l. 2. The registration message is prepared for transmission via the network to thereby register the apparatus with the other apparatus, and the registration message includes a network-independent identity of the apparatus. *Id.* The apparatus is also caused to receive a network-independent trigger based upon the network-independent identity of the apparatus to thereby trigger the apparatus to update registration of the apparatus with the other apparatus, including acquisition of a network-dependent identity of the apparatus to thereby enable establishment of a communication session with the apparatus based upon the network-dependent identity of the apparatus. *Id.* at FIG. 5, and p. 20, l. 21 – p. 22, l. 5.

6. ***Grounds of Rejection to be Reviewed on Appeal.***

Pending Claims 1-4, 7-12, 14, 16-21, 23, 25-30, 32-39, 43-48 and 52-54 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0064164 to Barany et al. Pending Claims 5, 13, 22, 31, 40 and 49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Barany, in view of U.S. Patent Application Publication No. 2004/0156380 to Silverman et al.; and the remaining pending claims, namely Claims 6, 15, 24, 33, 42 and 51, stand rejected as being unpatentable over Barany, in view of U.S. Patent Application Publication No. 2005/0210292 to Adams et al.

7. ***Argument.***

As explained below, Appellant respectfully submits that the claimed invention is patentably distinct from Barany, Silverman and Adams, taken individually or in any proper combination. In view of the remarks presented herein, Appellant respectfully requests reconsideration and reversal of the rejections of all of the pending claims.

A. Claims 1-4, 7-12, 14, 16-21, 23, 25-30, 32-39, 43-48 and 52-54 are Patentable

Pending Claims 1-4, 7-12, 14, 16-21, 23, 25-30, 32-39, 43-48 and 52-54 as being anticipated by Barany. Initially, Appellant notes that for a reference to anticipate a claim, “[t]he identical invention must be shown in as complete detail as is contained in the...claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989) (cited in MPEP § 2131). A single cited reference must expressly or inherently disclose each claim limitation. *Finstar Corp. v. DirectTV Group, Inc.*, 523 F.3d 1323, 1334 (Fed. Cir. 2003). “But disclosure of each element is not quite enough... ‘[a]nticipation requires the presence in a single prior art disclosure of all the elements of the claimed invention arranged as in the claim.’” *Id.* (quoting *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548) (emphasis added). Further, the Federal Circuit has reversed lower courts when those lower courts have “treated the claims as mere catalogs of separate parts, in disregard to the part-to-part relationships set forth in the claims that give the claims their meaning.” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1459 (Fed. Cir. 1984).

The following sections present Appellant’s previous arguments distinguishing the claimed invention from Barany, and address the Examiner’s responses to those arguments. The Examiner in the final Official Action of January 4, 2011, identified Appellant’s arguments as raising issues, which the Examiner numbered. For purposes of review, Appellant reiterates and follows the numbering of their arguments below.

1. Claims 1-9, 19-27 and 37-45 are Patentable over Barany

Relative to independent Claim 1 (and similarly independent Claims 19 and 37), Appellant presumes the Examiner alleges the following correspondence between independent Claim 1 and Barany, citing FIGS. 1 and 3, and paragraphs [0023], [0062] and [0063] of Barany.

Claim 1	Barany
An apparatus comprising: a processor; and a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:	Call state control function (CSCF) module 40
receive a connection request via a network across which an originating client is configured to communicate;	[0023] ... In some embodiments, the CSCF module 40 is a (Session Initiation Protocol) SIP proxy or server that receives call requests on behalf of other entities, resolves logical addresses or identifiers in the call requests, and forwards the call requests to intended destinations. ...
prepare a network-independent trigger for transmission to a terminal in response to receipt of the connection request; and	[0063] After SIP registration, the mobile station can initiate a packet-switched call by sending call setup messages (at 108). To initiate a call, the SIP INVITE request is sent, which includes the destination address of the terminal being called and indicates that the called terminal is being invited to participate in a call session. Various acknowledgment messages, as defined by SIP, are also exchanged between the mobile station and the CSCF 40. The SIP messages are routed through the CSCF 40 since the CSCF 40 acts as the SIP proxy.
receive a registration message, in response to the trigger, from the terminal via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.	[0062] After the primary PDP context has been activated, a SIP registration procedure is performed (at 106). The SIP registration procedure is performed with the CSCF 40, which includes the SIP proxy. SIP registration is performed to set up the profile for the mobile station in the CSCF 40, so that the CSCF 40 is aware of the mobile station's existence as well as various configuration information associated with the mobile station.

(a) Network-Independent Trigger – Issues (1)-(3)

In contrast to independent Claim 1, Barany does not teach or suggest an apparatus being caused to prepare a network-independent trigger for transmission to a terminal in response to receipt of a connection request. The Examiner cites the SIP INVITE of paragraph [0063] of Barany for allegedly disclosing this feature. As identified as issue (1) in the final Official Action, however, Appellant notes that nowhere does Barany disclose that its SIP INVITE is prepared for transmission “in response to receipt of a connection request;” instead, Barany’s SIP INVITE is a connection request. *See* Barany, para. [0063] (“To initiate a call, the SIP INVITE request is sent”). Accordingly, as identified as issue (2), Barany also does not disclose that its SIP INVITE is independent of the network via which a connection request is received, i.e., “network-independent.” Moreover, per issue (3), Barany does not disclose that its SIP INVITE is prepared for transmission to the terminal from which a registration message is received. In Barany, the SIP INVITE is transmitted from the mobile station that registered with the CSCF.

(i) Issue (1)

In response to issue (1), the Examiner states that by virtue of Barany’s SIP proxy receiving a SIP INVITE (alleged connection request) and forwarding it to an intended destination, the forwarded SIP INVITE constitutes a trigger prepared for transmission in response to receipt of a connection request. In this interpretation, the Examiner appears to consider the SIP INVITE to constitute both the recited connection request and trigger. Even given this interpretation, however, and now turning to issue (2), Barany still does not disclose that its SIP proxy receives the SIP INVITE (alleged connection request) via a network, but forwards the SIP INVITE (alleged trigger) independent of the network, similar to the trigger of independent Claim 1.

(ii) Issue (2)

In response to issue (2), the Examiner states that “according to fig. 5 of the present application, the Examiner understands the network independent trigger as a communication

initiation between the SIP proxy and the terminating node or client as the result of forwarding a requested call, which is clearly disclosed by Barany.” Official Action of Jan. 4, 2011, p. 3. Initially, as to the example embodiment illustrated by FIG. 5, Appellant notes that the network-independent trigger is not the result of the SIP proxy forwarding a requested call, but is instead in response to the SIP proxy receiving an INVITE message. The SIP proxy does not forward the INVITE message to the terminating SIP client until later in the process after the terminating SIP client has registered with the SIP proxy.

Further, Appellant submits that the network-independent trigger is more than simply a communication between SIP proxy and terminating node or client, as suggested by the Examiner. Rather, the network-independent trigger is “network independent.” That is, the network-independent trigger is a communication independent of the network via which the connection request is received. Appellant submits that any interpretation of the trigger of independent Claim 1 that does not consider that the trigger is explicitly recited as being “network-independent” impermissibly fails to give all words in the claim their normal meaning, as required. *See Ex parte Maurice Givens*, Appeal No. 2009-003414, Application No. 11/265,973 (BPAI Aug. 6, 2009) (holding that an interpretation of a claim that fails to give weight to words in a claim deprives the respective words of their normal meaning).

(iii) Issue (3)

In response to issue (3), the Examiner states:

[I]f the SIP proxy receives call requests on behalf of other entities and forwards said call requests to intended destinations; that is, connecting an originating communication device, e.g., the call requestor, with a termination device, e.g., the intended call destination, it is evident that the response to the requested call replaces the SIP INVITE sent from the SIP proxy to the destination node or client and is prepared for transmission to the terminal from which a registration message is received.

Official Action of Jan. 4, 2011, p. 3. Appellant submits that even if one could argue that the response to a SIP INVITE is prepared for transmission to the terminal from which a registration message is received (the registered terminal having originally sent the SIP INVITE message), the response is not being cited as corresponding to the recited trigger. Instead, the Examiner cites

the SIP INVITE message itself as the recited network independent trigger. And to now cite a response message as the trigger, the Examiner is impermissibly treating the claims as a mere catalog of separate parts, and disregards the part-to-part relationships set forth in the claims.

For at least the foregoing reasons, Appellant submits that the SIP INVITE of Barany does not correspond to a trigger similar to that of independent Claim 1.

(b) Registration Message - Issue (4)

As identified as issue (4), in further contrast to independent Claim 1, Barany does not teach or suggest an apparatus being caused to receive a registration message, in response to the network-independent trigger, via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal. The Examiner cites the SIP registration procedure of paragraph [0062] of Barany for allegedly disclosing this feature. However, Appellant notes that nowhere does Barany disclose that its SIP registration procedure occurs or that any registration message is received in response to the SIP INVITE – similar to the recited receipt of a registration message “in response to the network-independent trigger.” In fact, Barany explicitly discloses that SIP registration occurs before (not in response to) its SIP INVITE (alleged trigger) is sent. See Barany, para. [0063] (“After SIP registration, the mobile station can initiate a ... call To initiate a call, the SIP INVITE request is sent”).

In response to issue (4), the Examiner appears to misunderstand Appellant’s argument. The Examiner asserts that it is well known for that registration has to take place to establish communication between telecommunication devices, and further asserts that Barany clearly discloses SIP registration. Appellant agrees that Barany discloses SIP registration. But instead of Barany disclosing receipt of a registration message in response to a SIP INVITE (alleged trigger), Barany discloses receipt of a registration message (or rather, SIP registration) before the SIP INVITE. According to independent Claim 1, on the other hand, the registration message is received in response to the trigger (alleged SIP INVITE), and not vice versa.

2. Claims 10-18, 28-36 and 46-54 are Patentable over Barany

Relative to independent Claim 10 (and similarly independent Claims 28 and 46), Appellant presumes the Examiner alleges the following correspondence between independent Claim 1 and Barany, citing FIGS. 1 and 3, and paragraphs [0023], [0062] and [0063] of Barany.

Claim 10	Barany (annotated per the Examiner)
An apparatus comprising: a processor; and a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:	Call state control function (CSCF) module 40
receive a registration message via a network across which an originating client is configured to communicate, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a registration message from a terminal to thereby register the terminal with the apparatus, and	[0062] After the primary PDP context has been activated, a SIP registration procedure is performed (at 106). The SIP registration procedure is performed with the CSCF 40, which includes the SIP proxy. SIP registration is performed to set up the profile for the mobile station in the CSCF 40, so that the CSCF 40 is aware of the mobile station's existence as well as various configuration information associated with the mobile station.
wherein the registration message includes a network-independent identity of the terminal; and	"[A] SIP proxy ... registers the calling and called parties, handling the IP addresses required for packet switched communication; these IP address [sic] are independent of the circuit-switched cellular network, on behave [sic] of which the CSCF SIP proxy receives and handles those packet-switched call requests." Official Action of Oct. 7, 2010, pp. 6-7.
prepare a network-independent trigger for transmission to the terminal based upon the network-independent identity of the terminal to thereby trigger the terminal to update registration of the terminal with the apparatus, including acquisition by the apparatus of a	[0063] After SIP registration, the mobile station can initiate a packet-switched call by sending call setup messages (at 108). To initiate a call, the SIP INVITE request is sent, which includes the destination address of the terminal being called and indicates that the called terminal is being invited to participate in a call

network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.	session. Various acknowledgment messages, as defined by SIP, are also exchanged between the mobile station and the CSCF 40. The SIP messages are routed through the CSCF 40 since the CSCF 40 acts as the SIP proxy.
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As identified as issue (5), in contrast to independent Claim 10, Barany does not teach or suggest an apparatus being caused to at least prepare a network-independent trigger for transmission to a terminal based upon a network-independent identity of the terminal to thereby trigger the terminal to update its registration with the apparatus, including acquisition by the apparatus of a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal. The Examiner cites the SIP INVITE of paragraph [0063] of Barany for allegedly disclosing this feature; and for other features of independent Claim 10, cites GSM as the received network via which a registration message is received, and cites an IP address of a mobile station as the recited network-independent identity.

In contrast to the assertions of the Examiner, and as identified as issue (6), Appellant notes that nowhere does Barany disclose that the SIP INVITE is independent of the network (alleged GSM) via which the registration message is received, i.e., “network-independent.” Barany also does not disclose that its SIP INVITE is prepared for transmission to the terminal from which a registration message is received. In Barany, the SIP INVITE is transmitted from the mobile station that registered with the CSCF. Further, nowhere does Barany disclose that its SIP INVITE triggers the mobile station “to update registration” of the mobile station (alleged terminal) with the CSCF (alleged apparatus). Other than disclosing that the SIP INVITE is sent after SIP registration, nowhere does Barany disclose that its SIP INVITE has any affect on SIP registration. Moreover, nowhere does Barany disclose acquisition of a GSM-dependent identity (network-dependent identity, GSM being the alleged network) of the mobile station to enable establishment of a communication session with the mobile station based on the GSM-dependent identity (network-dependent identity), similar to independent Claim 10.

(iii) Issue (5)

In response to issue (5), the Examiner states that “since the SIP proxy receives call requests on behalf of other entities and forwards said call requests to intended destinations (see [0023]), there is no way to communicate with an intended destination without an identity of the destination node or device.” Official Action of Jan. 4, 2011, p. 4. Appellant fails to see how the fact that communication with a destination requires its identity has any pertinence to whether Barany anticipates the claimed invention. As explained above, independent Claim 1 recites preparation of a network-independent trigger for transmission to a terminal based on a network-independent identity of the terminal, which triggers the terminal to update its registration including acquisition of a network-dependent identity of the terminal. Even if Barany does communicate with an intended destination based on its identity, nowhere does Barany disclose that its SIP INVITE (alleged trigger) is network-independent and prepared for transmission based on a network-independent identity. And further, nowhere does Barany disclose that its SIP INVITE triggers a registration update including acquisition of a network-dependent identity.

(iv) Issue (6)

Regarding issue (6), the Examiner reiterates its interpretation of the network-independent trigger as in issue (2). But as explained above, not only is this interpretation incorrect, it fails to give all words in the claim their normal meaning. That is, the network-independent trigger is not the result of the SIP proxy forwarding a requested call, but is instead in response to the SIP proxy receiving an INVITE message. And any interpretation of the recited trigger that ignores the explicit recitation of the trigger being network-independent impermissibly fails to give all words in the claim their normal meaning, as required.

Appellant therefore respectfully submits that independent Claim 1, and by dependency Claims 2-9, is patentably distinct from Barany. Appellant also respectfully submit that independent Claims 10, 19, 28, 37 and 46 recite subject matter similar to that of independent Claim 1, including the aforementioned triggering the terminal (or an apparatus) or identifying the terminal (or an apparatus) independent of the network for which a communication session may ultimately be established. As such, Appellant also respectfully submits that independent Claims

10, 19, 28, 37 and 46, and by dependency Claims 11-18, 20-27, 29-36, 38-45 and 47-54, are patentably distinct from Barany for at least the same reasons given above with respect to independent Claim 1.

B. Claims 5, 13, 22, 31, 40 and 49 are Patentable

Pending Claims 5, 13, 22, 31, 40 and 49 stand rejected as being unpatentable over Barany, in view of Silverman. As explained above, independent Claims 1, 10, 19, 28, 37 and 46, and by dependency Claims 2-9, 11-18, 20-27, 29-36, 38-45 and 47-54, are patentably distinct from Barany. Appellant respectfully submits that Silverman does not cure the deficiencies of Barany. That is, even considering Silverman, neither Barany nor Silverman, taken individually or in any proper combination, teaches or suggests the aforementioned terminal-triggering feature, as recited by the claimed invention. And there is no apparent reason for one skilled in the art still to modify Barany with the teachings of Silverman in an effort to obviate the claimed invention. Thus, for at least the foregoing reasons as well as those given above with respect to independent Claims 1, 10, 19, 28, 37 and 46, Claims 6, 15, 24, 33, 42 and 51 are also patentably distinct from Barany, in view of Silverman.

C. Claims 6, 15, 24, 33, 42 and 51 are Patentable

Pending Claims 6, 15, 24, 33, 42 and 51 stand rejected as being unpatentable over Barany, in view of Adams. As explained above, independent Claims 1, 10, 19, 28, 37 and 46, and by dependency Claims 2-9, 11-18, 20-27, 29-36, 38-45 and 47-54, are patentably distinct from Barany. Appellant respectfully submits that Adams does not cure the deficiencies of Barany. That is, even considering Adams, neither Barany nor Adams, taken individually or in any proper combination, teaches or suggests the aforementioned terminal-triggering feature, as recited by the claimed invention. And there is no apparent reason for one skilled in the art still to modify Barany with the teachings of Adams in an effort to obviate the claimed invention. Thus, for at least the foregoing reasons as well as those given above with respect to independent Claims 1, 10, 19, 28, 37 and 46, Claims 6, 15, 24, 33, 42 and 51 are also patentably distinct from Barany, in view of Adams.

8. ***Claims Appendix,***

The claims subject to this appeal are as follows:

1. (Previously Presented) An apparatus comprising:
a processor; and
a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:
receive a connection request via a network across which an originating client is configured to communicate;
prepare a network-independent trigger for transmission to a terminal in response to receipt of the connection request; and
receive a registration message, in response to the trigger, from the terminal via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.
2. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus being caused to receive a connection request comprises the apparatus being caused to receive a connection request from the originating client, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further prepare the connection request for transmission to the terminal after registering the terminal.
3. (Previously Presented) An apparatus according to Claim 2, wherein the apparatus being caused to prepare the connection request comprises the apparatus being caused to prepare the connection request for transmission to the terminal through at least one other apparatus.
4. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus is embodied in a Session Initiation Protocol (SIP) proxy.

5. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus being caused to receive a connection request comprises the apparatus being caused to receive a connection request, and thereafter cause the connection request to be stored in a buffer, and wherein the apparatus being caused to prepare the connection request comprises the apparatus being caused to retrieve the connection request from the buffer and thereafter prepare the connection request for transmission to the terminal based upon the network-dependent identity of the terminal.

6. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a registration message from the terminal via at least one of a network address translator (NAT) or a firewall (FW) operating between the apparatus and the terminal,

and wherein the apparatus being caused to prepare a network-independent trigger comprises the apparatus being caused to prepare a network-independent trigger for transmission in a manner independent of the at least one of the NAT or FW.

7. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a subsequent registration message, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further:

receive a first registration message from the terminal before preparation of the network-independent trigger for transmission to thereby register the terminal with the apparatus, wherein the first registration message includes a network-independent identity of the terminal,

and wherein the apparatus being caused to prepare a network-independent trigger comprises the apparatus being caused to prepare a network-independent trigger for transmission based upon the network-independent identity of the terminal.

8. (Previously Presented) An apparatus according to Claim 1, wherein the apparatus being caused to prepare a network-independent trigger comprises the apparatus being caused to

prepare a network-independent trigger for transmission to the terminal via a network across which an originating client is configured to at least one of directly or indirectly communicate.

9. (Previously Presented) An apparatus according to Claim 8, wherein the network comprises at least one of a public network or a private network.

10. (Previously Presented) An apparatus comprising:
a processor; and
a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:
receive a registration message via a network across which an originating client is configured to communicate, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a registration message from a terminal to thereby register the terminal with the apparatus, and wherein the registration message includes a network-independent identity of the terminal; and
prepare a network-independent trigger for transmission to the terminal based upon the network-independent identity of the terminal to thereby trigger the terminal to update registration of the terminal with the apparatus, including acquisition by the apparatus of a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.

11. (Previously Presented) An apparatus according to Claim 10, wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further:

receive a connection request, the trigger being prepared for transmission in response to receipt of the connection request; and

prepare the connection request for transmission to the terminal after acquisition of the network-dependent identity of the terminal.

12. (Previously Presented) An apparatus according to Claim 11, wherein the apparatus being caused to prepare the connection request comprises the apparatus being caused to prepare the connection request for transmission to the terminal through at least one other apparatus.

13. (Previously Presented) An apparatus according to Claim 11, wherein the apparatus being caused to receive a connection request comprises the apparatus being caused to receive a connection request, and thereafter cause the connection request to be stored in a buffer, and wherein the apparatus being caused to prepare the connection request for transmission comprises the apparatus being caused to retrieve the connection request from the buffer and thereafter prepare the connection request for transmission to the terminal based upon the network-dependent identity of the terminal to thereby enable establishment of the communication session.

14. (Previously Presented) An apparatus according to Claim 10, wherein the apparatus is embodied in a Session Initiation Protocol (SIP) proxy.

15. (Previously Presented) An apparatus according to Claim 10, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a registration message from the terminal via at least one of a network address translator (NAT) or a firewall (FW) operating between the apparatus and the terminal,
and wherein the apparatus being caused to prepare a network-independent trigger comprises the apparatus being caused to prepare a network-independent trigger for transmission to the terminal in a manner independent of the at least one of the NAT or the FW.

16. (Previously Presented) An apparatus according to Claim 10, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a first registration message, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further:

receive a subsequent registration message from the terminal in response to the trigger being sent to the terminal to thereby update registration of the terminal and acquire the network-dependent identity of the terminal, thereby enabling establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.

17. (Previously Presented) An apparatus according to Claim 10, wherein the apparatus being caused to receive a registration message comprises the apparatus being caused to receive a registration message via a network across which an originating client is configured to at least one of directly or indirectly communicate.

18. (Previously Presented) An apparatus according to Claim 17, wherein the network comprises at least one of a public network or a private network.

19. (Previously Presented) A method comprising:
receiving a connection request at an apparatus via a network across which an originating client is configured to communicate;
preparing a network-independent trigger for transmission from the apparatus to a terminal in response to receiving the connection request; and
receiving a registration message, in response to the trigger, at the apparatus from the terminal via the network to thereby register the terminal with the apparatus and acquire a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.

20. (Previously Presented) A method according to Claim 19, wherein receiving a connection request comprises receiving a connection request at the apparatus from the originating client, the method further comprising preparing the connection request for transmission to the terminal after registering the terminal.

21. (Previously Presented) A method according to Claim 20, wherein preparing the connection request comprises preparing the connection request for transmission from the apparatus to the terminal through at least one other apparatus.

22. (Previously Presented) A method according to Claim 20, wherein receiving a connection request comprises receiving a connection request, and thereafter causing the connection request to be stored in a buffer, and wherein preparing the connection request comprises retrieving the connection request from the buffer and thereafter preparing the connection request for transmission to the terminal based upon the network-dependent identity of the terminal.

23. (Previously Presented) A method according to Claim 19, wherein preparing a trigger for transmission to the terminal comprises preparing a trigger for transmission to the terminal from an apparatus comprising a Session Initiation Protocol (SIP) proxy.

24. (Previously Presented) A method according to Claim 19, wherein receiving a registration message comprises receiving a registration message at the apparatus from the terminal via at least one of a network address translator (NAT) or a firewall (FW) operating between the apparatus and the terminal,

and wherein preparing a network-independent trigger comprises preparing a network-independent trigger for transmission in a manner independent of the at least one of the NAT or FW.

25. (Previously Presented) A method according to Claim 19, wherein receiving a registration message comprises receiving a subsequent registration message, wherein the method further comprises:

receiving a first registration message at the apparatus from the terminal before preparing the network-independent trigger for transmission to thereby register the terminal with the

apparatus, wherein the first registration message includes a network-independent identity of the terminal,

and wherein preparing a network-independent trigger comprises preparing a network-independent trigger for transmission based upon the network-independent identity of the terminal.

26. (Previously Presented) A method according to Claim 19, wherein preparing a network-independent trigger comprises preparing a network-independent trigger for transmission to the terminal via a network across which an originating client is configured to at least one of directly or indirectly communicate.

27. (Previously Presented) A method according to Claim 26, wherein the network comprises at least one of a public network or a private network.

28. (Previously Presented) A method comprising:
receiving a registration message at an apparatus via a network across which an originating client is configured to communicate, wherein receiving a registration message comprises receiving a registration message from a terminal to thereby register the terminal with the apparatus, and wherein the registration message includes a network-independent identity of the terminal; and

preparing a network-independent trigger for transmission to the terminal based upon the network-independent identity of the terminal to thereby trigger the terminal to update registration of the terminal with the apparatus, including acquisition by the apparatus of a network-dependent identity of the terminal to thereby enable establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.

29. (Previously Presented) A method according to Claim 28 further comprising:
receiving a connection request at the apparatus from the originating client, the trigger being prepared for transmission in response to receiving the connection request; and

preparing the connection request for transmission from the apparatus to the terminal after acquiring the network-dependent identity of the terminal.

30. (Previously Presented) A method according to Claim 29, wherein preparing the connection request comprises preparing the connection request for transmission from the apparatus to the terminal through at least one other apparatus.

31. (Previously Presented) A method according to Claim 29, wherein receiving a connection request comprises receiving a connection request, and thereafter causing the connection request to be stored in a buffer, and wherein preparing the connection request comprises retrieving the connection request from the buffer and thereafter preparing the connection request for transmission to the terminal based upon the network-dependent identity of the terminal to thereby enable establishment of the communication session.

32. (Previously Presented) A method according to Claim 28, wherein receiving a registration message at an apparatus comprises receiving a registration message at an apparatus comprising a Session Initiation Protocol (SIP) proxy.

33. (Previously Presented) A method according to Claim 28, wherein receiving a registration message comprises receiving a registration message at an apparatus from the terminal via at least one of a network address translator (NAT) or a firewall (FW) operating between the apparatus and the terminal,

and wherein preparing a network-independent trigger comprises preparing a network-independent trigger for transmission to the terminal in a manner independent of the at least one of the NAT or the FW.

34. (Previously Presented) A method according to Claim 28, wherein receiving a registration message comprises receiving a first registration message, and wherein the method further comprises:

receiving a subsequent registration message at the apparatus from the terminal in response to the trigger being sent to the terminal to thereby update registration of the terminal and acquire the network-dependent identity of the terminal, thereby enabling establishment of a communication session with the terminal based upon the network-dependent identity of the terminal.

35. (Previously Presented) A method according to Claim 28, wherein receiving a registration message comprises receiving a registration message via a network across which an originating client is configured to at least one of directly or indirectly communicate.

36. (Previously Presented) A method according to Claim 35, wherein receiving a registration message comprises receiving a registration message via in a network comprising at least one of a public network or a private network.

37. (Previously Presented) An apparatus comprising:
a processor; and
a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:
receive a trigger from another apparatus operating in a network across which an originating client is configured to communicate, the trigger comprising a network-independent trigger; and in response to receipt of the trigger,
prepare a registration message for transmission to the other apparatus via the network to thereby register the apparatus with the other apparatus and acquire a network-dependent identity of the apparatus to thereby enable establishment of a communication session with the apparatus based upon the network-dependent identity of the apparatus.

38. (Previously Presented) An apparatus according to Claim 37, wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger in response to the other apparatus receiving a connection request from the originating

client, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further receive the connection request from the other apparatus after registration of the apparatus.

39. (Previously Presented) An apparatus according to Claim 38, wherein the apparatus being caused to receive the connection request comprises the apparatus being caused to receive the connection request from the other apparatus via at least one further apparatus.

40. (Previously Presented) An apparatus according to Claim 38, wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger in response to the other apparatus receiving, and thereafter storing in a buffer, a connection request from the originating client, and wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to the other apparatus to thereby enable the other apparatus to retrieve the connection request from the buffer and thereafter send the connection request to the apparatus based upon the network-dependent identity of the apparatus.

41. (Previously Presented) An apparatus according to Claim 37, wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger from another apparatus comprising a Session Initiation Protocol (SIP) proxy.

42. (Previously Presented) An apparatus according to Claim 37, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to the other apparatus via at least one of a network address translator (NAT) or a firewall (FW) operating between the other apparatus and the apparatus,

and wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger in a manner independent of the at least one of the NAT or the FW.

43. (Previously Presented) An apparatus according to Claim 37, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a subsequent registration message for transmission, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further:

prepare a first registration message for transmission to the other apparatus before receipt of the trigger to thereby register the apparatus with the other apparatus, wherein the first registration message includes a network-independent identity of the apparatus to thereby enable the processor to receive the network-independent trigger based upon the network-independent identity of the apparatus.

44. (Previously Presented) An apparatus according to Claim 37, wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger from another apparatus operating in a network across which an originating client is configured to at least one of directly or indirectly communicate.

45. (Previously Presented) An apparatus according to Claim 44, wherein the apparatus being caused to receive a trigger comprises the apparatus being caused to receive a trigger from another apparatus operating in a network comprising at least one of a public network or private network.

46. (Previously Presented) An apparatus comprising:
a processor; and
a memory including computer program code, the memory and computer program code configured to, with the processor, cause the apparatus to at least:

prepare a registration message for transmission to another apparatus operating in a network across which an originating client is configured to communicate, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a

registration message for transmission via the network to thereby register the apparatus with the other apparatus, wherein the registration message includes a network-independent identity of the apparatus; and

receive a network-independent trigger based upon the network-independent identity of the apparatus to thereby trigger the apparatus to update registration of the apparatus with the other apparatus, including acquisition of a network-dependent identity of the apparatus to thereby enable establishment of a communication session with the apparatus based upon the network-dependent identity of the apparatus.

47. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to receive a network-independent trigger comprises the apparatus being caused to receive a network-independent trigger in response to the other apparatus receiving a connection request from the originating client, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further receive the connection request from the other apparatus after registration of the apparatus with the other apparatus.

48. (Previously Presented) An apparatus according to Claim 47, wherein the apparatus being caused to receive the connection request comprises the apparatus being caused to receive the connection request from the other apparatus node via at least one further apparatus.

49. (Previously Presented) An apparatus according to Claim 47, wherein the apparatus being caused to receive a network-independent trigger comprises the apparatus being caused to receive a network-independent trigger in response to the other apparatus receiving, and thereafter storing in a buffer, the connection request, and wherein the apparatus being caused to receive the connection request comprises the apparatus being caused to receive the connection request from the other apparatus, the other apparatus having retrieved the connection request from the buffer and thereafter sent the connection request to the apparatus based upon the network-dependent identity of the apparatus.

50. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to another apparatus comprising a Session Initiation Protocol (SIP) proxy.

51. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to another apparatus via at least one of a network address translator (NAT) or a firewall (FW) operating between the other apparatus and the apparatus,

and wherein the apparatus being caused to receive a network-independent trigger comprises the apparatus being caused to receive a network-independent trigger in a manner independent of the at least one of the NAT or the FW.

52. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a first registration message for transmission to another apparatus to thereby register the apparatus with the other apparatus, and wherein the memory and computer program code are further configured to, with the processor, cause the apparatus to further prepare a subsequent registration message for transmission to the other apparatus in response to receipt of the trigger to thereby update registration of the apparatus and acquire the network-dependent identity of the apparatus to thereby enable establishment of a communication session with the apparatus based upon the network-dependent identity of the apparatus.

53. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to another apparatus operating in a network

across which an originating client is configured to at least one of directly or indirectly communicate.

54. (Previously Presented) An apparatus according to Claim 46, wherein the apparatus being caused to prepare a registration message comprises the apparatus being caused to prepare a registration message for transmission to another apparatus operating in a network comprising at least one of a public network or a private network.

9. ***Evidence Appendix.***

None.

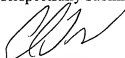
10. ***Related Proceedings Appendix.***

None.

CONCLUSION

For at least the foregoing reasons, Appellant respectfully requests that the rejections be reversed.

Respectfully submitted,



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